

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION., et al.,

Debtors.

Chapter 11

Case No. 23-11069-CTG

(Jointly Administered)

Hearing Date: Oct. 23, 2023 at 10:00 am ET

Obj. Deadline: October 16, 2023 at 4 p.m. ET

**NOTICE OF MOTION OF DONNA LEE DAUGHERTY
FOR ORDER PURSUANT TO SECTION 362(d) OF THE BANKRUPTCY
CODE, BANKRUPTCY RULE 4001 AND LOCAL BANKRUPTCY RULE
4001-1 MODIFYING THE AUTOMATIC STAY TO ALLOW
CONTINUATION OF WRONGFUL DEATH LITIGATION**

TO: (A) COUNSEL FOR THE DEBTORS; (B) COUNSEL FOR THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (C) COUNSEL FOR THE DEBTOR-IN-POSSESSION FINANCING LENDERS; (D) COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; AND (E) KNOWN PARTIES HAVING AN INTEREST IN THE SUBJECT PROPERTY AS SET FORTH IN THE ATTACHED CERTIFICATE OF SERVICE:

PLEASE TAKE NOTICE that Donna Lee Daugherty (the “Movant”) has filed the *Motion of Donna Lee Daugherty for Order Pursuant to Section 362(d) of the Bankruptcy Code, Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1 Modifying the Automatic Stay to Allow Continuation of the Wrongful Death Litigation* (the “Motion”). A copy of the Motion is attached.

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion are required to be filed on or before **October 16, 2023 at 4:00 p.m.** (the “Objection Deadline”) with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd floor, Wilmington, Delaware 19801. At the same time, you must also serve a copy of the response upon the undersigned counsel so as to be received on or before the

Objection Deadline.

PLEASE TAKE FURTHER NOTICE that, if an objection or response is timely filed, served and received, and such objection or response is not otherwise timely resolved, a hearing on the Motion will be held on **October 23, 2023, at 10:00 a.m. (ET)** before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd floor, courtroom 7, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that pursuant to Del. Bankr. L.R. 4001-1(c)(iii), the hearing will be a preliminary hearing at which the Court may (A) hear oral argument, (B) determine whether an evidentiary or other final hearing is necessary, (C) set a date by which the parties shall exchange supporting documentation, (D) set a date by which the parties must produce the report of any appraiser whose testimony is to be presented at the final hearing and/or (E) set a date and time for a final hearing.

PLEASE TAKE FURTHER NOTICE THAT IF YOU DO NOT PROPERLY FILE AND SERVE AN OBJECTION OR OTHER RESPONSE TO THE MOTION BY THE OBJECTION DEADLINE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 5, 2023

THE ROSNER LAW GROUP LLC

By: /s/ Frederick B. Rosner
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